



JAMES A. NOYES, Director

COUNTY OF LOS ANGELES

DEPARTMENT OF PUBLIC WORKS

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December 12, 2002

IN REPLY PLEASE REFER TO FILE: **EP-2**

Ms. Peggy Harris, Chief
State Regulatory Programs Division
California Department of
Toxic Substances Control
P.O. Box 806
Sacramento, CA 95812-0806

Dear Ms. Harris:

ELECTRONIC WASTE

We commend Cal-EPA, specifically the Department of Toxic Substances Control and the California Integrated Waste Management Board, for sponsoring the Cal-EPA Electronic Wastes Forum held on November 25, 2002. As operator of the largest local government household hazardous waste (HHW) and electronic waste (e-waste) collection programs in the nation, we had looked forward to participating on the Forum's Government Panel. Unfortunately, this was not possible, however, we sincerely appreciate the opportunity to briefly address the Forum during the public comment period since e-waste is of critical importance to the County of Los Angeles.

For the record, it cannot be overly stated that local governments have been saddled with the heavy financial burden of collecting, transporting, and recycling e-waste. For example, in order to fund our e-waste collection program, which began operating full-scale in October 2002, we curtailed our Countywide HHW collection program by 25 percent to cover the costs of collecting e-waste. Despite implementing significant measures to increase efficiency and minimize costs, this reduction in HHW services was necessary due to the lack of financial assistance from the State or the private sector. While it is true that the private sector, such as Hewlett-Packard, has implemented several take-back programs, the impact of these programs is small compared to the volume collected and money spent by local governments to operate their e-waste collection programs.

As Cal-EPA moves forward in working with stakeholders to draft legislative language to develop a workable solution, we strongly encourage Cal-EPA to fully support and promote product stewardship policies to assist local government in this endeavor. It

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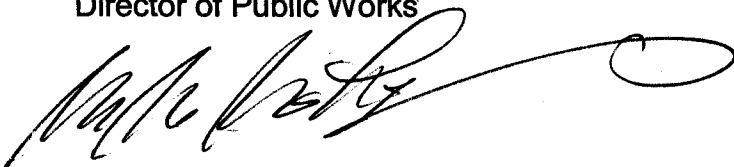
should be recognized that manufacturers of electronic goods are in the best position to properly manage e-waste since they have the technical expertise, financial resources, and know the needs of their customers best to effectively and efficiently deal with this issue.

We would like to offer our assistance in tackling the management of e-waste by participating in any working group that is established since we play a central role in addressing this issue in a County that represents 1/3 of the State's population. We are confident that, by working together, we can bridge the gap between manufacturers, retailers, and government to provide a meaningful solution. We look forward to working with you and other stakeholders.

Should you have any questions, please contact me at (626) 458-3500.

Very truly yours

JAMES A. NOYES
Director of Public Works

A handwritten signature in black ink, appearing to read 'M. Michael Mohajer', with a large, stylized flourish extending to the right.

M. MICHAEL MOHAJER
Assistant Deputy Director

PA:my
P:\Paul\e-waste letter2

cc: Winston Hickox, Agency Secretary of Cal-EPA
Edwin Lowry, Director of the California Department of Toxic Substances Control
Michael Paparian, Member of the California Integrated Waste Management Board
Members of the Los Angeles County Integrated Waste Management Task Force